



U.S. Department of Justice

United States Attorney  
Southern District of New York

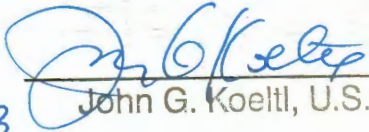
86 Chambers Street  
New York, New York 10007

March 15, 2023

BY ECF

Hon. John G. Koeltl  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED

3/15/23   
John G. Koeltl, U.S.D.J.

Re: *Kunstler et al. v. Central Intelligence Agency et al.*, No. 22 Civ. 6913 (JGK)

Dear Judge Koeltl:

I write respectfully on behalf of defendants the Central Intelligence Agency ("CIA") and Michael R. Pompeo, the former Director of the CIA (together, the "Federal Defendants"), as well as the plaintiffs, to request an increase to the word limit in Section II.D of Your Honor's Individual Practices for the anticipated briefing on the Federal Defendants' motion to dismiss the plaintiffs' amended complaint, and to extend the time for Plaintiffs to respond to the Federal Defendants' opening brief and for the Federal Defendants' reply.

The Court previously extended the briefing schedule such that the Federal Defendants' opening brief is due on Monday, March 20. ECF No. 29. The Federal Defendants intend to file their brief on that date, but request that the word limit for that brief be increased to 14,000 words, because they will make several independent arguments why the amended complaint should be dismissed, each of which relies on its own body of case law that must be discussed separately.

Plaintiffs similarly request an increased word limit of 14,000 for their opposition brief, and that the deadline for it be pushed back to May 8, 2023, given their counsel's vacation schedule in April. And the Federal Defendants further request that their reply brief be due on May 30, 2023, and that their word limit be increased to 7,000 words.

We thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

By: s/Jean-David Barnea  
JEAN-DAVID BARNEA  
Assistant United States Attorney  
Telephone: (212) 637-2679  
Email: Jean-David.Barnea@usdoj.gov

cc: All parties (by ECF)